

**Comments to Federal Register [DOCID: FR13AP04-143]**

April 13, 2004

All substance abuse testing within the federal government is required by law to be fair and equitable (E.O. 12564). "Fair and equitable" applies not only to agreed upon parameters for new testing methods [the test itself], but it also requires that those tests be implemented in a "fair and equitable" manner for all who are subjected to them. In other words **all employees, at all agencies**, should conform to identical testing. Giving agencies the flexibility to select one testing method over another is a complete disconnect with uniformity and is not in keeping with the laws original intent. "Fair and equitable" requires that testing standards and methods remain identical throughout the government.

With this proposal SAMHSA is essentially promoting an injustice. Drug abuse is intolerable no matter the agency. Consistency in testing should be practiced government-wide. Instead of encouraging further discord, SAMHSA should concentrate its efforts on correcting inconsistencies that prevail within the current federal testing program. For example...

- 1) Why is split sample urine testing not utilized government-wide for all federal civilians?
- 2) Why are taxpayer dollars wasted when we send urine samples to contract lab in Glenview, IL, when those same samples could be tested locally and at a cheaper price at a SAMHSA approved laboratory?
- 3) Why are taxpayer dollars wasted on maintaining federal facilities and staff when laboratory testing and rehabilitative services are available in a private sector setting?

These are the questions that need to be addressed.

Mark E. Meadows  
Air Traffic Control Specialist, GS-2152  
Fort Rucker, AL

cc Congressman Mark E. Sauder, Chairman, Subcommittee on Drug Policy  
Congressman Elijah E. Cummings, Ranking Member, Subcommittee on Drug Policy  
Senator Judd Gregg, Chairman, Committee on Health, Education, Labor, and Pensions  
Senator Edward Kennedy, Ranking Member, Committee on Health, Education, Labor, and Pensions